

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SPIN MASTER LTD. and SPIN MASTER,  
INC.

*Plaintiffs,*

v.

ACIPER *et al.*

*Defendants.*

Case No.: 19-cv-6949

**DECLARATION OF WANG LE IN SUPPORT OF  
MOTION TO DISSOLVE OR MODIFY THE *EX PARTE* RESTRAINING ORDER**

Wang Le, declares under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a Manager of Shenzhen Yongli Hongtai Investment Development Co., Ltd., d/b/a Jscout (“**Jscout**” or “**Defendant**”), a defendant in this action. I submit this declaration in support of Defendant’s motion to dissolve or modify the *ex parte* restraining order entered by this Court on August 1st, 2019. I am over 18 years of age. This declaration is made upon personal knowledge, except where otherwise noted.
2. At present, Jscout offers over seventy items for sale on its Amazon storefront.
3. Since 2017, Jscout has made approximately \$1,820,634 in sales.
4. Plaintiffs have alleged intellectual property issues for only one of Defendant’s products, listed for sale as “Epoch Air Rc Cars for Kids Remote Control Car Toys Wall Climbing Dual Mode 360°Rotating Stunt Rechargeable High Speed Vehicle with LED Lights” with the following Amazon Standard Identification Number (ASIN) numbers: Parent ASIN B07KLSB6NZ and Child ASIN B07FKRY7CK (the “**Disputed Product**”).

5. The product sales for the Disputed Product is approximately \$546,291, or essentially 30% of Defendant's sales.

6. The product sales for Defendants other, undisputed products, is approximately \$1,274,342.

7. In other words, approximately 70% of Defendant's business has nothing to do with the Disputed Product.

8. Since entry of the Court's Order August 1, 2019, all of Defendant's funds have become frozen, including funds related to other, unrelated products.

9. Because of the asset freeze, Defendant is also refraining from selling any of its products on Amazon until its motion can be considered.

10. Defendant's entire business is extremely prejudiced by the continued freezing of all of its assets.

11. Defendant has since engaged counsel, Lewis & Lin, to appear on its behalf and defend the suit.

12. I respectfully request that Defendant's application to vacate or modify the TRO as against it be granted.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 9.4, 2019

By:   
WANG LE